EXHIBIT 63

Case: 1:17-md-02804-DAP Doc #: 2181-68 Filed: 08/12/19 2 of 4. PageID #: 325851

SD0010 - Suspicious Order Check (SOMS)

Owner aDocument Control
Team Order to Cash
Status 6-Document Control

Description The DEA requires the reporting of unusually large quantities or any suspicious order lines for controlled substances. The program must compare customer orders for controlled substance items with four (4) historical purchasing

benchmarks by customer and by the respective customer's class and type. These benchmarks include the average monthly purchase of the controlled substance line item and the average item quantity per order. If the order line item exceeds any of the four benchmarks, the order is classified as suspicious and the order is blocked for delivery. The customer is contacted to determine the nature/reason for the order. If the customer's response is not satisfactory, the DEA is notified and the order is rejected. If the customer's response is satisfactory, the order is released for processing. A release reason code is captured in these instances.

Team Lead

Linked nodes and documents Process level 3: SD0010 Standard Order

Custom fields GMP Assessment

Current Approval:

Content

Type User Exit Priority 1-Critical

Category Major Modification
Module Sales and Distribution

Implementation ERP3

Phase

Application SAP R/3

Input/Dependencies Data input dependencies include the customer master, material master and the data conversion of the purchasing benchmarks

from the Manfact system.

Required Functionality The system must compare customer orders for controlled substance items (MAEX-EMBGR = Controlled (Material master -> Foreign trade Export view -> Legal Control -> Grouping for Legal Control) with four (4) historical purchasing benchmarks for a customer account and its associated class and type. These benchmarks include the average monthly purchase of the controlled substance item and the average item quantity per order. If the order item exceeds any of the four benchmarks by a tolerance factor (we refer to as the multiplier), the order is classified as suspicious and the complete order (and item) is blocked for delivery.

Suspicious Order Monitoring is divided into two separate functions:

- a) Check at sales order entry/change in order to monitor and possibly block the order.
- b) Maintain the benchmark tables (EDD0024) at month end.

Therefore, custom tables must be created in order to capture the purchasing benchmarks. See EDD0024 for the definition of these custom tables. The other tables to be used for these benchmarks would be info structure tables S910 and S911 for the Customer and the class of trade benchmarks. The four benchmarks to be used are:

Customer Class & type:

- 1) Average/Month Average monthly purchase of a controlled substance item by customer's customer class and type during the prior twelve (12) month period; only those months containing purchases are included in the average.
- 2) Average/Purchase average item quantity per order purchased by customer's customer class and type during the prior twelve (12) months; total controlled substance item quantity purchased during the prior twelve (12) months divided by the number of times purchased by all customers within the customer class and type

Customer:

- 3) Customer (ship-to)/Month average monthly purchase of a controlled substance item by customer during the prior twelve (12) month period; only those months containing purchases are included in the average.
- 4) Customer (ship-to)/Purchase average item quantity per order purchased by customer during the prior twelve (12) months; total controlled substance item quantity purchased during the prior twelve (12) months divided by the number of times purchased.

A tolerance factor must be established that can be maintained if necessary. The tolerance factor is a single entry that applies to all benchmarks for a specific class of trade. This represents a multiple (for example, 1.5) which is applied to each benchmark for comparison against the sale. See EDD0024 for the table definition. (This is what we refer to as the multiplier)

The purchasing benchmarks must be compared during sales order processing (VA01 - create order or VA02 - change sales order) and a delivery block is placed on the order header and item if any of the benchmarks (including the tolerance factor) are exceeded.

The sales order check must also compare the month to date cumulative shipped quantity (invoiced quantity) plus order quantity against the Class of trade average per month and the customer average per month. The order should be blocked if the order quantity plus the cumulative month to date quantity exceeds the benchmark.

The following delivery blocks must be used:

- 10 Suspect (COT Av/mth)
- 11 Suspect (COT Av/ord)
- 12 Suspect (Cus Av/mth)
- 13 Suspect (Cus Av/ord)

Once a decision is reached to release a sales order item from this block - a reason code must be updated in the additional data B screen of the item (see EDD0052). This reason code will be used for reporting purposes. The following reason codes are valid:

Increased supply to new or existing Customer/patient

Increased supply to new facility

Consistent with customer order pattern

Increased stocking due to Watson promotion/price change

Change in ordering frequency/increased seasonal usage

Consolidation for customer facilities

Introduction of new product or product reintroduction

First time order for product

Consistent with customer class order pattern

Order meets minimum order quantities

Customer Type coding error

Other - (Requires approval from Director/VP

Released unchanged with DEA concurrence